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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

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ATTORNEYS FOR PLAINTIFFS

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

JOSE GOMEZ, individually and on behalf of
a class of similarly situated individuals,

Plaintiff,

v.

CAMPBELL-EWALD COMPANY, a
Delaware corporation,

Defendant.

Case No.

CV10 2007 DMG (CWx)

CLASS ACTION COMPLAINT
FOR DAMAGES AND
INJUNCTIVE RELIEF

1) Violation of 47 U.S.C. § 227

DEMAND FOR JURY TRIAL

CLASS ACTION COMPLAINT

Plaintiff Jose Gomez brings this class action complaint against Defendant Campbell-Ewald Company ("Campbell-Ewald") to stop Defendant's practice of making unsolicited text message calls to cellular telephones, and to obtain redress for all persons injured by its conduct. This court has jurisdiction over this class action pursuant to 28 U.S.C. § 1332 (d). Plaintiff, for his class action complaint, alleges as follows upon personal knowledge as to himself and his own acts and experiences, and, as to all other matters, upon information and belief, including investigation conducted by his attorneys.

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

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NATURE OF THE CASE

1. Defendant Campbell-Ewald, a self-described "top 25 American advertising agency," designs and implements advertising campaigns nationwide for clients such as General Motors, Kaiser Permanente and Alltel Wireless. During one such campaign for the U.S. Navy, Defendant Campbell-Ewald engaged in an especially pernicious form of marketing: the unauthorized transmission of advertisements in the form of "text message" calls to the cellular telephones of consumers throughout the nation.

2. By effectuating these unauthorized text message calls (hereinafter, "wireless spam"), Defendant has caused consumers actual harm, not only because consumers were subjected to the aggravation that necessarily accompanies wireless spam, but also because consumers frequently have to pay their cell phone service providers for the receipt of such wireless spam.

3. In order to redress these injuries, Plaintiff, on behalf of himself and a nationwide class of similarly situated individuals, brings suit under the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.* ("47 U.S.C. § 227"), which prohibits unsolicited voice and text calls to cell phones.

4. On behalf of the class, Plaintiff seeks an injunction requiring Defendant to cease all wireless spam activities, and an award of statutory damages to the class members, together with costs and reasonable attorneys' fees.

PARTIES

5. Plaintiff is a resident of Illinois.

6. Defendant Campbell-Ewald is a Delaware corporation who at all relevant times maintained its headquarters and principal place of business in Michigan. A subsidiary of the Interpublic Group of Companies, Inc., Campbell-Ewald is a global advertising agency that provides marketing services to its clients throughout the United States, including this district.

JURISDICTION & VENUE

7. The Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332 (d), because (a) at least one member of the putative class is a citizen of a state different from Defendant, (b) the amount in controversy exceeds \$5,000,000, exclusive of interest and costs, and (c) none of the exceptions under that subsection apply to this action.

8. This Court has personal jurisdiction over the Defendant because the acts alleged herein originated in this District and because the Defendant maintains offices in this District.

9. Venue is proper in this district pursuant to 28 U.S.C. §1391(a) because Defendant resides in this District and because a substantial part of the events giving rise to the claim occurred in this District, as the Defendant's agent that transmitted the text message calls also resides in this District.

COMMON ALLEGATIONS OF FACT

10. In recent years, marketers who often have felt stymied by federal laws limiting solicitation by telephone, facsimile machine, and e-mail have increasingly looked to alternative technologies through which to send bulk solicitations cheaply.

11. One of the newest types of such bulk marketing is to advertise through Short Message Services. The term "Short Message Service" or "SMS" is a messaging system that allows cellular telephone subscribers to use their cellular telephones to send and receive short text messages, usually limited to 160 characters.

12. An "SMS message" is a text message call directed to a wireless device through the use of the telephone number assigned to the device. When an SMS message call is successfully made, the recipient's cell phone rings, alerting him or her that a call is being received. As cellular telephones are inherently mobile and are frequently carried on their owner's person, calls to cellular telephones, including SMS messages, may be instantly received by the called party virtually anywhere worldwide.

1 13. Unlike more conventional advertisements, SMS calls, and particularly
2 wireless spam, can actually cost their recipients money, because cell phone users must
3 frequently pay their respective wireless service providers either for each text message call
4 they receive or incur an usage allocation deduction to their text plan, regardless of whether or
5 not the message is authorized.

6 14. Over the course of an extended period beginning in at least 2006, Defendant
7 directed the mass transmission of wireless spam to the cell phones of consumers nationwide
8 to advertise on behalf of the U.S. Navy.

9 15. For instance, on or about May 11, 2006, Plaintiff's cell phone rang, indicating
10 that a text call was being received.

11 16. The "from" field of such transmission was identified cryptically as "43704,"
12 a format which Plaintiff later learned was an abbreviated telephone number known as an
13 SMS short code licensed and operated by Defendant's agent. The body of such text message
14 read:

15 DESTINED FOR SOMETHING BIG? DO IT IN THE NAVY.
16 GET A CAREER. AN EDUCATION. AND A CHANCE TO SERVE
17 A GREATER CAUSE. FOR A FREE NAVY VIDEO CALL 1-800-510-2074.

18 17. Defendant's and its agent's use of an SMS short code enabled Defendant's
19 mass transmission of wireless spam to a list of cellular telephone numbers.

20 18. Indeed, over the next several months, Plaintiff received additional spam text
21 message advertisements from the same short code, in knowing violation of Plaintiff's
22 privacy.

23 19. At no time did Plaintiff consent to the receipt of such text message calls from
24 Defendant.

25 **CLASS ACTION ALLEGATIONS**

26 20. Plaintiff brings this action pursuant to Federal Rule of Civil Procedure
27 23(b)(2) and Rule 23(b)(3) on behalf of himself and a class (the "Class") defined as follows:
28

1 all persons in the United States and its Territories who received one or more unauthorized
2 text message advertisements from Defendant.

3 21. In order to make its *en masse* transmissions of text message advertisements
4 economical, Defendant and its agents used one or more short codes to transmit the text
5 messages to thousands of consumers' cellular telephone numbers. As such, the Class consists
6 of thousands of individuals and other entities, making joinder impractical.

7 22. Plaintiff will fairly and adequately represent and protect the interests of the
8 other members of the Class. Plaintiff has retained counsel with substantial experience in
9 prosecuting complex litigation and class actions. Plaintiff and his counsel are committed to
10 vigorously prosecuting this action on behalf of the members of the Class, and have the
11 financial resources to do so. Neither Plaintiff nor his counsel has any interest adverse to
12 those of the other members of the Class.

13 23. Absent a class action, most members of the Class would find the cost of
14 litigating their claims to be prohibitive, and will have no effective remedy. The class
15 treatment of common questions of law and fact is also superior to multiple individual actions
16 or piecemeal litigation in that it conserves the resources of the courts and the litigants, and
17 promotes consistency and efficiency of adjudication.

18 24. Defendant has acted and failed to act on grounds generally applicable to the
19 Plaintiff and the other members of the Class in transmitting the wireless spam at issue,
20 requiring the Court's imposition of uniform relief to ensure compatible standards of conduct
21 toward the members of the Class.

22 25. The factual and legal bases of Defendant's liability to Plaintiff and to the other
23 members of the Class are the same, resulting in injury to the Plaintiff and to all of the other
24 members of the Class as a result of the transmission of the wireless spam alleged herein.
25 Plaintiff and the other Class members have all suffered harm and damages as a result of
26 Defendant's unlawful and wrongful conduct as a result of the transmission of the wireless
27 spam.

1 26. There are many questions of law and fact common to the claims of Plaintiff
2 and the other members of the Class, and those questions predominate over any questions that
3 may affect individual members of the Class. Common questions for the Class include but are
4 not limited to the following:

5 (a) Does the wireless spam Defendant distributed violate 47 U.S.C. § 227?

6 (b) Are the Class's members entitled to treble damages based on the
7 willfulness of Defendant's conduct?

8 **FIRST CAUSE OF ACTION**
9 **(Violation of 47 U.S.C. § 227: On behalf of the Class)**

10 27. Plaintiff incorporates by reference the foregoing allegations as if fully set
11 forth herein.

12 28. Defendant made unsolicited commercial text calls, including the message
13 transcribed above, to the wireless telephone numbers of the Class. Each such text message
14 call was made using equipment that had the capacity to store or produce telephone numbers
15 using a random or sequential number generator, and to dial such numbers. By using such
16 equipment, Defendant was able to effectively send text messages to thousands of consumers'
17 wireless telephone numbers without human intervention.

18 29. These text calls were made *en masse* and without the prior express consent of
19 the Plaintiff and the other members of the Class to receive such wireless spam.

20 30. Defendant has, therefore, violated 47 U.S.C. § 227(b)(1)(A)(iii). As a result
21 of Defendant's conduct, the members of the class suffered damages by, *inter alia*, having to
22 pay their respective wireless carriers for the text messages where applicable, and, under
23 section 227(b)(3)(B), are each entitled to, *inter alia*, a minimum of \$500.00 in damages for
24 each violation of such act.

25 31. Because Defendant had knowledge that Plaintiff and the Class did not consent
26 to the receipt of the aforementioned wireless spam, the Court should, pursuant to section 47
27 U.S.C. § 227(b)(3)(C), treble the amount of statutory damages recoverable by the Plaintiff
28 and the other members of the Class.

1 WHEREFORE, Plaintiff Jose Gomez, on behalf of himself and the Class, prays for
2 the following relief:

- 3 1. An order certifying the Class as defined above;
- 4 2. An award of actual and statutory damages;
- 5 3. An injunction requiring Defendant to cease all wireless spam
6 activities;
- 7 4. An award of reasonable attorneys' fees and costs; and
- 8 5. Such further and other relief the Court deems reasonable and just.

9
10 **JURY DEMAND**

11 Plaintiff requests trial by jury of all claims that can be so tried.

12
13 Respectfully submitted,

14 Dated: March 19, 2010

15
16 By: 

17 Sean P. Reis
18 EDELSON MCGUIRE, LLP
19 Attorneys for JOSE GOMEZ,
20 individually and on behalf of a class of
21 similarly situated individuals
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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Dolly Gee and the assigned discovery Magistrate Judge is Carla Woehrle.

The case number on all documents filed with the Court should read as follows:

CV10- 2007 DMG (CWx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

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NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

ORIGINAL

FAXED

Name & Address:

Sean Reis (sreis@reisfirm.com)
 EDELSON MCGUIRE LLP
 30021 Tomas Street, Suite 300
 Rancho Santa Margarita, CA 92688
 (949) 459-2124

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

JOSE GOMEZ, individually and on behalf of a class
 of similarly situated individuals,

PLAINTIFF(S)

v.

CAMPBELL-EWALD COMPANY, a Delaware
 corporation,

DEFENDANT(S).

CASE NUMBER

CV10 2007 DMG (CWx)

SUMMONS

TO: DEFENDANT(S): CAMPBELL-EWALD COMPANY, a Delaware corporation,

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Sean Reis, whose address is 30021 Tomas Street, Suite 300, Rancho Santa Margarita, CA 92688. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

MAR 19 2010

Dated: _____

CHRISTOPHER POWERS

By: _____

Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

COPY

FAXED

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEETI (a) PLAINTIFFS (Check box if you are representing yourself ☐)
JOSE GOMEZ, individually and on behalf of a class of similarly situated individualsDEFENDANTS
CAMPBELL-EWALD COMPANY, a Delaware corporation(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)
Sean Reis (sreis@reisfirm.com), Edelson McGuire LLP, 30021 Tomas Street, Suite 300, Rancho Santa Margarita, CA 92688 (949) 459-2124

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.)

☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)☐ 2 U.S. Government Defendant ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input checked="" type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input checked="" type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. ORIGIN (Place an X in one box only.)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify)	<input type="checkbox"/> 6 Multi-District Litigation	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge
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V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)CLASS ACTION under F.R.C.P. 23: ☒ Yes ☐ No☒ MONEY DEMANDED IN COMPLAINT: \$ in excess of 5,000,000VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
Violation of 47 U.S.C. 227 (Telephone Consumer Protection Act)

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	TORTS PERSONAL INJURY	TORTS PERSONAL PROPERTY	PRISONER PETITIONS	LABOR
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 710 Fair Labor Standards Act
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 530 General Habeas Corpus	<input type="checkbox"/> 720 Labor/Mgmt. Relations
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act
<input type="checkbox"/> 450 Commerce/ICC Rates/etc.	<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Fed Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 740 Railway Labor Act
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 790 Other Labor Litigation
<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans)	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 610 Agriculture	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 620 Other Food & Drug	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 810 Selective Service	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 850 Securities/Commodities Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 630 Liquor Laws	<input type="checkbox"/> 861 HIA (13951f)
<input type="checkbox"/> 875 Customer Challenge 12 USC 3410	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 445 American with Disabilities - Employment	<input type="checkbox"/> 640 R.R. & Truck	<input type="checkbox"/> 862 Black Lung (923)
<input checked="" type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 446 American with Disabilities - Other	<input type="checkbox"/> 650 Airline Regs	<input type="checkbox"/> 863 DIWC/DIWW (405(g))
<input type="checkbox"/> 891 Agricultural Act	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 660 Occupational Safety/Health	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 892 Economic Stabilization Act	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 463 Habeas Corpus-Alien Detainee		<input type="checkbox"/> 690 Other	<input type="checkbox"/> 865 RSI (405(g))
<input type="checkbox"/> 893 Environmental Matters	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 465 Other Immigration Actions			<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 894 Energy Allocation Act	<input type="checkbox"/> 240 Torts to Land				<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 245 Tort Product Liability				
<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice	<input type="checkbox"/> 290 All Other Real Property				
<input type="checkbox"/> 950 Constitutionality of State Statutes					

FOR OFFICE USE ONLY: Case Number:

CV10 2007

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District, California County outside of this District, State if other than California, or Foreign Country, in which **EACH** named plaintiff resides.
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District *	California County outside of this District, State, if other than California, or Foreign Country
	Illinois

(b) List the County in this District, California County outside of this District, State if other than California, or Foreign Country, in which **EACH** named defendant resides.
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District *	California County outside of this District, State, if other than California, or Foreign Country
	Delaware/Michigan

(c) List the County in this District, California County outside of this District, State if other than California, or Foreign Country, in which **EACH** claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District *	California County outside of this District, State, if other than California, or Foreign Country
Los Angeles	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved.

X. SIGNATURE OF ATTORNEY (OR PRO PER)  Date March 19, 2010

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935f(f))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))